WA 3019
11/17/99
4a

Enforcement Confidential----Do not release.

**RCRA Follow up Sampling/Case Development Inspection for:**

NOW RELEASABLE
Beverly A. Ogle
SIGNATURE/DATE 2/8/01

FILE COPY

| | |
|---|---|
| Facility Name: | J.H. Baxter & Co. |
| Facility Address: | 6520 188th Northeast<br>Arlington, Washington 98223 |
| Facility Mailing Address: | P.O. Box 305<br>Arlington, Washington 98223 |
| Facility Contacts: | Georgia Baxter, Executive Vice president<br>Tom Orthmeyer, Plant Manager<br>Robert Crane, Assistant Plant manager<br>Kimberly Blodgett, Environmental Health and Safety Technician<br>James Clawson, Treating Engineer; HW Coordinator |

**Inspection Information**

| | |
|---|---|
| Inspection Date: | November 17, 1999 |
| Inspectors: | Cheryl Williams<br>Jack Boller<br>Andrew Hess<br>Jed Januck |
| Report Author: | Cheryl Williams |
| Date of Report: | April 14, 2000 |
| Weather Conditions: | Dry, mostly overcast with occasional sun breaks.<br>Some light rain during the previous week. |
| Time of Inspection: | 8:15 a.m. - 12:30 p.m. |

**Purpose of Inspection**

The purpose of this inspection was primarily to collect samples from various areas around the drip pads to be analyzed for pentachlorophenol (PCP) to determine whether the drip pads are being operated in a manner consistent with RCRA requirements.

**Inspection**

This was an unannounced inspection. Mr. Jack Boller and I arrived at the facility at approximately 8:15am. Once our presence was known, we were escorted to the conference room

and joined by Ms. Kim Blodgett, the Environmental Health and Safety Officer, and Mr. Tom Orthmeyer, the Plant Manager. We were informed that some of the company's protocols had changed since our last visit and that we would need to conduct our opening interview with Ms. Georgia Baxter on the phone. (Ms. Baxter is the Executive Vice President of the company and is located in California). While we were waiting for Ms. Baxter to be reached by phone, Ms. Blodgett, reviewed the health and safety precautions and as part of the revised protocols took photocopies of our credentials. We told Mr. Orthmeyer and Ms. Blodgett that we would be taking samples and that they were welcome to take their own split samples. Once Ms. Baxter was on the phone we explained the purpose of our inspection. Ms. Baxter stated that she wanted to take split samples. We explained the purpose of the inspection was to confirm that the staining on the aprons was PCP and that two other inspectors from EPA would be joining us and their role would be to collect samples. We informed the company representatives that we would like to tour the facility again prior to the arrival of our colleagues. Ms. Baxter then asked that she be contacted by phone for the exit interview. Mr. Orthmeyer told us that they had been working at correcting the various items that we mentioned during our last inspection. For example, they had been working on sealing the cracks in the containment area of the tank farm.

We proceeded outside with Ms. Blodgett and Mr. Orthmeyer and were joined by Mr. Bob Crane, the Assisstant Plant Manager. We noticed that there were many deep puddles around the property some under piles of treated wood. Throughout Parcel A, the treated wood side, there was standing water in the ditches that flowed into the french drains. (see photo # 14 of french drain # 23). The drainage ditch which runs along the North side of the property between the office and Parcel A had an oily sheen in it. This drainage ditch flows into french drain #23. We began the inspection at the aprons and drip pad on the north side of the retorts. Three charges (charges consist of several poles that have been bundled together for treatment in the retorts) were on the drip pad associated with retort number 2 (the eastern most retort). Since our last inspection the seams around the two drip pads (between the drip pads and aprons and between the center asphalt strip and the drip pads) had been sealed. We noticed that at the low point of the slope of each apron was a long, narrow puddle which extended the length of the apron parallel to the drip pads from south to north and appeared to drain into the french drain at the end of each drip pads (see attached photos #s 9,11,13,17).

We continued on the facility inspection by walking across the drip pad associated with retort number 3, to the stairs which lead to the tank farm. There are two set of stairs which lead to the tank farm. Each set is located to the left of a retort door. To access the tank farm, employees must take one of those two sets of stairs. However, to use the stairs located between the two retorts employees must walk across the 12-foot wide drip pad, unless they walk the entire 165-foot length of the drip pads down the center asphalt strip between the drip pads. During our August inspection and the inspection on this day, we observed people walking across the drip pads to gain access to the tank farm using the stairs located between the two retorts. From our observations and photographic evidence (see photo #s 6 & 7) the facility is not minimizing tracking of hazardous waste or hazardous waste constituents off the drip pad as a result of activities by personnel. 40 CFR §265.443(j)

The cracks we had previously reported in the cement floor of the tank farm containment area had been sealed and the entire floor of the tank farm containment area had been painted with a cement paint. (photo # 1)

There was only one drum in the satellite accumulation area in the tank farm and it was closed per RCRA requirements.

In the concrete area around the butt tank, we observed the location of the cracks we noted during our last inspection. It appeared that there had been an attempt to seal them. Mr. Orthmeyer stated that this was the area at which they were having some difficulty getting the sealant to adhere due to the weather conditions. (see attached photo # 2)

We then walked to the shop area on the northeast side of Parcel A, where during the previous inspection we had found a unlabeled, drum of used solvent which was not closed. The drum had been removed and there was no other drum in this location.

We then returned to the conference room to await Mr. Januch and Mr. Andy Hess, our colleagues who were to collect the samples. They arrived at approximately 10:20 a.m. Ms. Blodgett reviewed the health and safety plans for the company and then Mr. Hess explained the sampling plans and told the facility representatives that we planned to only analyze the samples for PCP. We returned to the retort area of Parcel A with Ms Blodgett, Mr. Orthmeyer and Mr. Crane. We were joined by Mr. Jim Clawson who gave his job title as Treating Engineer and Hazardous Waste Coordinator, the latter, he stated was on an as needed basis.

Mr. Hess collected samples for EPA and Mr. Clawson (with Mr. Hess' assistance) took samples for the company. Both Mr. Januch & Mr. Boller took photographs of the sample collection for EPA and Mr. Orthmeyer took photographs for the company.

The first sample was collected on the apron just outside of retort number 2 (the east retort, south end of apron). For a complete report of the sampling collection which took place, refer to the memorandum from Mr. Hess to Cheryl Williams, dated December 16, 1999.

The results of the analysis of the samples is set forth in the December 16, 1999 memo. The results of samples, except the blank, showed PCP. The results of the analyses of the wipe samples ranged from 34,000,000 ppb to 120,000,000 ppb. The results of the analyses of the soil samples ranged from 9,600 to 11,000 ppb and the results of the analyses of the water samples ranged from 170 to 520 ppb. These results indicate that the facility has not complied with 40 CFR § 265.443(b)(iii), (d) and (m).

While samples 7-10 were being taken, I observed the northern-most end of the two drip pads. The ends consist of a cement berm and a wooden stop made of dimensional lumber. Mr. Orthmeyer and Mr. Crane informed me that the cement berm was not part of the original drip pad design and was added later. At the end of the drip pad inside the end berm, I was able to see

where the liner exited the ground at the end of the "designed" drip pads at the corners. There was a noticeable crack between the added berm and the drip pads. (see photo #s 15 & 16). When I looked in the crack I was able to see liquid. This indicates that the facility is not in compliance with 40 CFR § 265.443(d). The width of the concrete berm at the end of each drip pad was cracked. There was a stain which appeared to extend over the berm and onto the drip pad. (see same photo). The stain was a darker color than the drip pad and was marked with tire treads. The regulation at 40 CFR §265.443(j) requires that "[d]rip pads must be operated and maintained in a manner to minimize tracking of hazardous waste or hazardous waste constituents off the drip pad as a result of activities by equipment."

Once the samples were collected, Mr. Boller and I returned to the conference room with the facility representatives while Mr. Hess and Mr. Januch finished labeling and preparing the samples. Once in the conference room, Ms. Baxter was again contacted via phone and we conducted the exit interview. Ms. Baxter asked when our report would be ready how we expected to use any data that we may get. She stated that we would find PCP in the samples on the aprons and believed that would be part of Baxter's "de minimis" program. Thus, J.H. Baxter has detected release of hazardous waste but has not complied with 40 CFR § 265.443(m).

File Review

I conducted a file review at EPA following this inspection and found information to support that french drains numbered #13 and 14 "are connected via a horizontal pipe beneath the surface which then is hard piped across the road to a culvert which directs flow to french drain #23" (Baxter's letter to Ecology dated January 28, 1999, RE: Comments on Revised Draft NPDES Waste Discharge Permit No. WA-003142-9, dated December 14, 1998).

Calvin Terada, an Underground Injection Control (UIC) Program inspector has reported to me orally and Jonathan Williams , an Underground Injection Control Program inspector, documented in his inspection notes for the June 4, 1999 UIC inspection that during a discussion with Bob Crane, Mr. Crane said that the drains are cleaned out every 2-4 years due the to buildup of silt and the sludge removed from the drains is put onto the treated log storage area soil surface.

Baxter has compiled four years of storm water data for the untreated side of the facility. The composite sampling results of "french drains numbered 10, 11 and 16-22, located on the untreated side of the facility, contains PCP, listed hazardous waste (F032). The topographic maps show that the location of these french drains are in the the lowest portion of the facility. Storm water forms large ponds in this area which makes sampling of many of the individual french drain s difficult or impossible. Any ponding that contains F032 is a hazardous waste surface impoundment as defined in 40 CFR §260.10 and manages a listed hazardous waste.

In addition, an Ecology water compliance inspection report dated 3/7/96 showed that a sample from the down spout of the roof above the cooling tower/evaporator showed PCP contamination.

Conclusions:

1. The drip pads and associated collections systems are not designed and operated to convey, drain, and collect liquid resulting from drippage or precipitation in order to prevent run-off as required by 40 CFR §265.443(d).

2. J.H. Baxter has disposed of hazardous waste by operating in such a way that listed hazardous waste is discharged or deposited or spilled onto land and J.H. Baxter is disposing of hazardous waste contaminated storm water in the storm water collection ditches and on the ground throughout on the property. The ditches are hazardous waste surface impoundments and other impacted ground is a landfill as defined by RCRA. J.H. Baxter and Co. is operating without a permit in violation of 3005 of RCRA.

3. J.H. Baxter does not operate the drip pads in a manner to minimize tracking of hazardous waste or hazardous waste constituents off the drip pads as a result of activities by personnel or equipment as required by 40 CFR §265.443(j).

4. J.H. Baxter has detected release of hazardous waste but has not complied with 40 CFR §265.443(m).

**J.H Baxter (Arilington) WAD053823019 Inspection on November 17,1999**

Photographer: Jack Boller Witness: Cheryl Williams

Photo Number: 1
Comments: Tank farm containment crack at this location sealed and painted since last visit.

Photo Number 2:
Comments: Butt tank containment area; cracks sealed since last visit

**J.H Baxter (Arilington) WAD053823019 Inspection on November 17,1999**

Photographer: Jack Boller Witness: Cheryl Williams

Photo Number: 3
Comments: Staining on south end of east apron


Photo Number 4:
Comments: Staining on south end of east apron

**J.H Baxter (Arilington) WAD053823019 Inspection on November 17,1999**

Photographer: Jack Boller Witness: Cheryl Williams

Photo Number: 5
Comments: South end of east drip pad/apron; sampling newly sealed seam


Photo Number 6:
Comments: South end of asphalt which divides the drip pads; stairs to tank farm behind pole.

**J.H Baxter (Arilington) WAD053823019 Inspection on November 17,1999**

Photographer: Jack Boller Witness: Cheryl Williams

Photo Number: 7
Comments: South end of west apron; note facility personnel standing on drip pad

Photo Number 8:
Comments: South end of west apron

**J.H Baxter (Arilington) WAD053823019 Inspection on November 17,1999**

Photographer: Jack Boller Witness: Cheryl Williams

Photo Number: 9
Comments: Middle of west apron in depression which channels to french drain #13 (note equipment tracks up to drip pad)

Photo Number: 10
Comments: Middle of west apron in depression which channels to french drain #13

**J.H Baxter (Arilington) WAD053823019 Inspection on November 17,1999**

Photographer: Jack Boller Witness: Cheryl Williams

Photo Number: 11
Comments: French drain #13 (note equipment tracks on apron)


Photo Number: 12
Comments: North end of east apron in channel which flows to french drain #14

**J.H Baxter (Arilington) WAD053823019 Inspection on November 17,1999**

Photographer: Jack Boller Witness: Cheryl Williams

Photo Number: 16
Comments: End of east drip pad (note: crack @ point liner end is out of the ground, free liquid was seen in crack) (note: tire tracks on drip pad)


Photo Number 17:
Comment: Picture taken from north end of drip pads.

**J.H Baxter (Arilington) WAD053823019 Inspection on November 17,1999**

Photographer: Jack Boller Witness: Cheryl Williams

Photo Number: 13
Comments: French drain #14

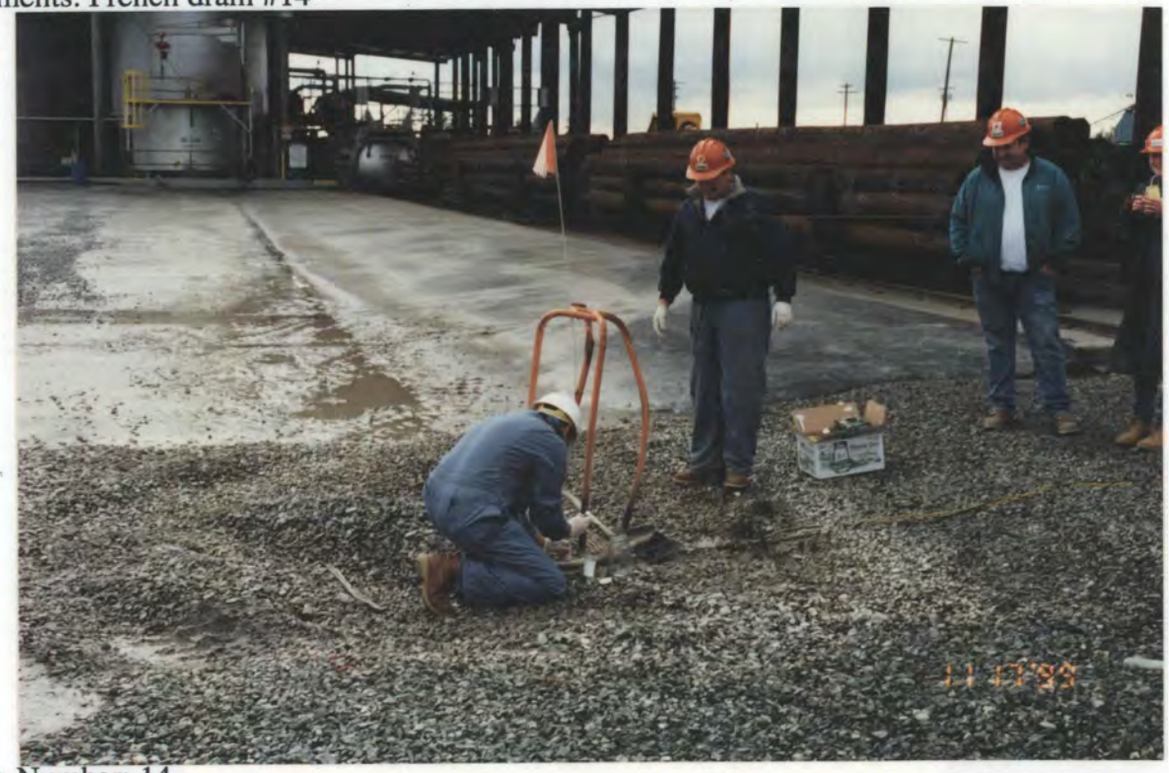


Photo Number: 14
Comments: French drain #23

**J.H Baxter (Arilington) WAD053823019 Inspection on November 17,1999**

Photographer: Jack Boller Witness: Cheryl Williams

Photo Number: 15
Comments: Berm & bumpers @ north ends of drip pads according to facility representatives.
(note: corner of liner visible, free liquid could be seen in cracks; staining and debris)

# FIELD SAMPLE DATA AND CHAIN OF CUSTODY SHEET

EPA Region 10
1200 Sixth Avenue
Seattle WA 98101

Case No.: _____ ☑ Enforcement/Custody ☑ Data Confidential ☑ Possible Toxic/Hazardous ☐ Data for STORET

Miscellaneous: _____

Sampling Crew: Andy Hess, Jeo Janusch

Project Code: ESD-043A Account: 9900B10P0102E

Name/Location: J.H. Baxter 1 (EPA Lab Only, Leave Blank for Contract Lab)

Proj. Off.: Andy Hess Tel.# 360 371-3711

Recorder: _____ (Signatures Required)

| SOURCE CODE | Matrix: Oil | Water | Sediment | Tissue | Prsrvd (Y/N) | # CONTAINERS: Qt. Cubit | Gal. Cubit | 16 oz. | 8 oz. | 120 ml. | 40 ml. | Other | LAB NUMBER: Yr. | Wk | Seq | STORET STATION NUMBER | SAMPLING DATE & TIME: Yr | Mo | Dy | Time | TRAFFIC REPORT NUMBERS: Org. | Inorg. | SAMPLER'S INITIALS | STATION DESCRIPTION |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 83 | | | | ✓ | | | | | | 1 | | | 99 | 47 | 4350 | | 99 | 11 | 17 | 1102 | | | AH | #1 APRON, NORTH OF RETORT #2 |
| 83 | | | | ✓ | | | | | | 1 | | | | | 4351 | | | | | 1109 | | | AH | #2 SEAM BETWEEN APRON & DRIP PAD OF RETORT #2 |
| 83 | | | | ✓ | | | | | | 1 | | | | | 4352 | | | | | 1114 | | | AH | #3 AREA BETWEEN THE 2 DRIP PADS |
| 83 | | | | ✓ | | | | | | 1 | | | | | 4353 | | | | | 1117 | | | AH | #4 SEAM B/APRON & DRIP PAD OF RETORT #3 |
| 83 | | | | ✓ | | | | | | 1 | | | | | 4354 | | | | | 1121 | | | AH | #5 APRON, NORTH SIDE OF RETORT #3 |
| 49 | | | ✓ | | | | | | | 1 | | | | | 4355 | | | | | 1126 | | | AH | #6 SOIL FROM RETORT #3 APRON |
| 36 | | ✓ | | | | | | | | 1 | | | | | 4356 | | | | | 1133 | | | AH | #7 WATER FROM DRAIN NORTH OF #3 APRON |
| 49 | | | ✓ | | | | | | | 1 | | | | | 4357 | | | | | 1146 | | | AH | #8 SEDIMENT N. END OF #2 APRON |
| 36 | | ✓ | | | | | | | | 1 | | | | | 4358 | | | | | 1141 | | | AH | #9 WATER N. END OF #2 APRON |
| 36 | | ✓ | | | | | | | | 1 | | | ↓ | ↓ | 4359 | | ↓ | ↓ | ↓ | 1155 | | | AH | #10 WATER FROM DRAW N. OF #2 APRON |
| 00 | | | ✓ | | | | | | | 1 | | | 99 | 47 | 4360 | | 99 | 11 | 17 | 1215 | | | AH | #11 BLANK SWAB |

| LAB NUMBER: Yr. | Wk | Seq | DEPTH | Unit | Type | COL MTD CD | QA CODE | TEMP DEG C | pH | CNDCTVTY umho/cm | COMPOSITE ONLY: ENDING DATE Mo. | Day | Time | Type | Freq |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | | | | | |

Condition of Samples upon Receipt at Lab:

Custody Seals Intact: ☐ yes ☐ no ☐ none

CHAIN OF CUSTODY RECORD

| Relinquished by: (signature) | Received by: (signature) | Date/Time |
|---|---|---|
| Relinquished by: (signature) | Received by: (signature) | Date/Time |
| Relinquished by: (signature) | Received by: (signature) | Date/Time |
| Relinquished by: (signature) | Received by Mobile Lab For Field Analysis: (signature) | Date/Time |
| Dispatched by: (signature) 11/17/99 6:40 pm | Received for Lab by: (signature) | Date/Time |

Method of Shipment: Hand Delivered

Laboratory Copy White — Project Officer Copy Yellow — Field or Office Copy Pink

## ★ Source Codes and Descriptions ★

| Code | Description |
|---|---|
| 00 | Unspecified Source |
| 01 | Unknown Liquid Media (Drum/Tank) |
| 02 | Unknown Liquid Media (Spill Area) |
| 03 | Unknown Liquid Media (Waste Pond) |
| 10 | Water (General) |
| 12 | Ambient Stream/River |
| 13 | Lake/Reservoir |
| 14 | Estuary/Ocean |
| 15 | Spring/Seepage |
| 16 | Rain |
| 17 | Surface Runoff/Pond (General) |
| 18 | Irrigation Canal/Return Flow |
| 20 | Well (General) |
| 21 | Well (Industrial/Agricultural) |
| 22 | Well (Drinking Water Supply) |
| 23 | Well (Test/Observation) |
| 24 | Drinking Water Intake |
| 25 | Drinking Water (At Tap) |
| 30 | Effluent Wastewater (General) |
| 31 | Municipal Effluent |
| 32 | Municipal Inplant Waters |
| 33 | Sewage Runoff/Leachate |
| 34 | Industrial Effluent |
| 35 | Industrial Inplant Waters |
| 36 | Industrial Surface Runoff/Pond |
| 37 | Industrial Waste Pond |
| 38 | Landfill Runoff/Pond/Leachate |
| 40 | Sediment (General) |
| 42 | Bottom Sediment or Deposit |
| 44 | Sludge (General) |
| 45 | Sludge (Waste Pond) |
| 46 | Sludge (Drum/Tank) |
| 48 | Soil (General) |
| 49 | Soil (Spill/Contaminated Area) |
| 50 | Bore Hole Material |
| 60 | Air (General) |
| 61 | Ambient Air |
| 62 | Source or Effluent Air |
| 63 | Industrial or Workroom Air |
| 64 | Hi-Vol Filter |
| 70 | Tissue (General) |
| 71 | Fish Tissue |
| 72 | Shellfish Tissue |
| 73 | Bird Tissue |
| 74 | Mammal Tissue |
| 75 | Macroinvertebrate |
| 76 | Algae |
| 77 | Periphyton |
| 78 | Plant/Vegetation |
| 80 | Oil/Solvent (General) |
| 81 | Oil (Transformer/Capacitor) |
| 82 | Oil/Solvent (Drum/Tank) |
| 83 | Oil/Solvent (Spill Area) |
| 84 | Oil/Solvent (Waste Pond) |
| 90 | Commercial Product Formulation |
| 95 | Well Drill Water |
| 96 | Well Drill Mud |
| 97 | Well Sealing Material |
| 98 | Gravel Pack Material |

## ★ Collection Method Codes ★

| Code | Description |
|---|---|
| 00 | Unknown |
| 10 | Hand Grab |
| 11 | Plastic Bucket |
| 12 | Stainless Steel Bucket |
| 13 | Brass Kemmerer |
| 14 | PVC Kemmerer |
| 15 | D.O. Dunker |
| 16 | DH 48/DH 49 Integrating Sampler |
| 17 | Van Dorn Bottle |
| 18 | Glass Dip Tube |
| 19 | Other |
| 20 | Automatic Sampler (General) |
| 21 | ISCO Auto Sampler |
| 22 | Manning Auto Sampler |
| 25 | Well Point Sampler (Pump) |
| 26 | Stainless Steel Bailer (Hand) |
| 30 | Dredge (Unspecified) |
| 31 | Dredge (Peterson) |
| 32 | Dredge (Van Dorn) |
| 33 | Dredge (Van Veen) |
| 34 | Core |
| 35 | Freeze Core |
| 40 | Macroinvertebrate (Unspecified) |
| 41 | Picked by Hand |
| 42 | Kick Net |
| 43 | Surber |
| 44 | Modified Hess Type Sampler |
| 45 | Rock Basket |
| 46 | Hester Dandy Sampler |
| 50 | Fish (Unspecified) |
| 51 | Fish (Shocking) |
| 52 | Fish (Netting) |
| 53 | Fish (Hook & Line) |
| 54 | Fish (Poison) |
| 60 | Periphyton (Unspecified) |
| 61 | Rock Scraping |
| 62 | Glass Slides |

## ★ Composite Codes ★

| Type | Description |
|---|---|
| T | Time Composite |
| S | Space Composite |
| F | Flow Propotrioned Composite |
| B | Both Space & Time Composite |

| Freq | Description |
|---|---|
| C | Continuous |
| G | Grabs (# Unknown) |
| ## | Number of Grabs |

## ★ Depth Codes ★

| Unit | Description |
|---|---|
| F | Feet |
| M | Meters |

| Type | Description |
|---|---|
| - | Regular (Blank) |
| V | Vertically Integrated |
| B | Sample at Bottom |

## ★ Quality Assurance Codes ★

| Code | Description |
|---|---|
| FBLK | Field Blank Sample (Dist $H_2O$) |
| FXFR | Field Transfer Blank Sample |
| FTRS | Field Transport Blank Sample |
| FRXS | Field Reagent Sample |
| FRNS | Field Rinse Water Sample |
| FSPK | Field Spiked Sample |
| FDP1 | Field Duplicate Sample #1 |
| FDP2 | Field Duplicate Sample #2 |
| FSPL | Field Split Sample |

★ U.S. GPO: 1997-591-914

# JH Baxter RCRA Sampling Photograph Log, 11/17/99

Photos 959-961: Overview of sampling area.
962 - sample site #1
963 - sample site #2 near retort #2 at seam between drip pad and asphalt apron.
964 - sample #3 on asphalt between #2 and #3 drip pads
965 - sample #4 on seam between asphalt apron and drip pad for retort #3, on north side of retort #3 and west side of the drip pad.
966 - sample #5
967 - overview
968 - sample #6
969 - West drain from which sample #7 was taken
970 - Sample #7
971 - Area near sample #8 & 9
972 - Sample # 8 & 9, general area
973 - Sample #9
974 - East Drain sample location for sample #10
975 - Sample #10
976 - Sample #10
977 - East side of retorts/drip pads
978 - East side of retorts/drip pads
979 - Pentachlorophenol label
980 - Pentachlorophenol label

Photographs #959-961 were taken by Andrew Hess, USEPA
Photographs #962-980 were taken by Jed Januch, USEPA

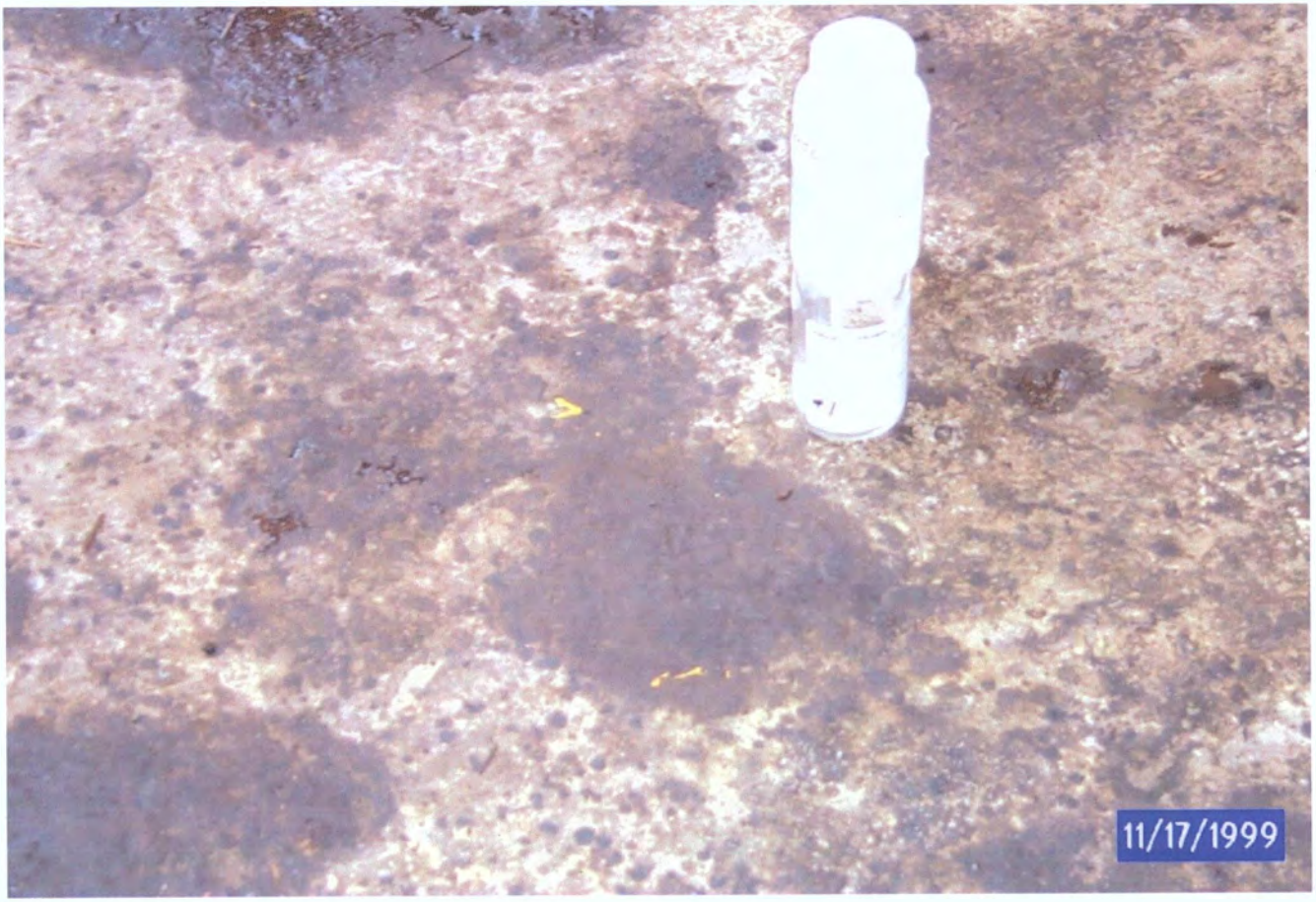
J H BAXTER


959


960

PHOTOS BY ANDREW HESS, USEPA
AND LED JANUCH, USEPA


961

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RESTRICTED USE PESTICIDE
Vulcan
BLOCK PENTA
PENTACHLOROPHENOL
Pentachlorophenol, UN 3155, RQ
TECHNICAL GRADE
KEEP OUT OF REACH OF CHILDREN
DANGER
POISON
STATEMENT OF PRACTICAL TREATMENT
SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONS
Vulcan Materials Company
DIRECTIONS FOR USE
STORAGE AND DISPOSAL
NOTICE TO BUYER
11/17/1999

979


RESTRICTED USE PESTI
Vulca
BLOCK PE
PENTACH OPHE
Pentachlorophenol, UN 3155,
TECHNICAL GRADE
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STATEMENT OF PRACTICAL TREATMENT
SEE SIDE PANELS FOR ADDITIONAL PRECAUTI
Vulcan Materials Company
EPA Reg. No. 5382-16
EPA Est. 5382
11/17/1999

980

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
REGION 10 LABORATORY
7411 BEACH DR. EAST
PORT ORCHARD, WASHINGTON 98366

December 16, 1999

MEMORANDUM

SUBJECT : **JH Baxter**
RCRA Sampling Inspection
Arlington, Washington

FROM: Andrew Hess, Environmental Scientist
Investigations and Engineering Unit

TO: Cheryl Williams
Office of Wastes and Chemical Management

Attached are the laboratory results, photographs, and other supporting documentation for the RCRA sampling inspection at JH Baxter, Arlington, Washington, conducted on November 17, 1999. Samples were collected by myself with the assistance of Jed Januch, also of the Office of Environmental Assessment.

Wipe samples were collected using a new, sterile 4" x 4" gauze for each sample. Methanol was added to each gauze prior to the initial wipe. A typical area wiped was about 100 square centimeters.

Sediment samples were collected by using new, solvent rinsed, stainless steel spoons. Water samples were collected by using new 10 ml glass pipettes. All sample jars were pre-cleaned to EPA specifications. Duplicate or side-by-side samples were taken by, or provided to the facility. New, unused gauze wipes were submitted to the laboratory as a "blank" sample.

Below is a summary of the sample results:

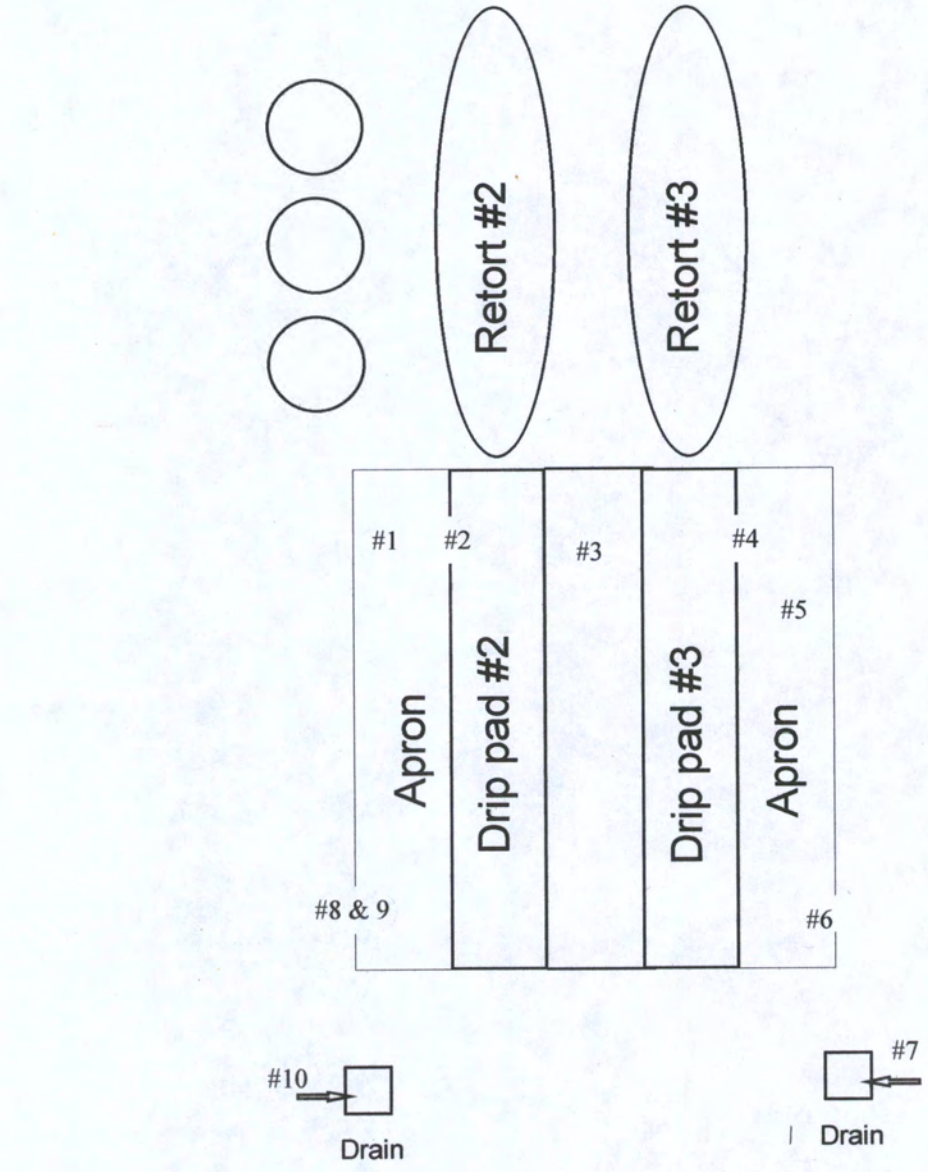
| Sample # | Location | PCP Concentration |
|---|---|---|
| 99474350 | #1, Apron, north of retort #2 (wipe) | 75,000,000 ug/Kg (7.5%) |
| 99474351 | #2, Seam between Apron and drip pad of retort #2 (wipe) | 110,000,000 ug/Kg (11%) |
| 99474352 | #3, Area between the 2 drip pads (wipe) | 120,000,000 ug/Kg (12%) |
| 99474353 | #4, Seam between apron and drip pad of retort #3 (wipe) | 37,000,000 ug/Kg (3.7%) |
| 99474354 | #5, Apron, North side of retort #3 (wipe) | 34,000,000 ug/Kg (3.4%) |
| 99474355 | #6, Soil from retort #3 apron | 9,600 ug/Kg (ppb), (9.6 ppm) |
| 99474356 | #7, Water from drain north of #3 apron | 390 ug/L (ppb) |
| 99474357 | #8, Soil from north end of #2 apron | 11,000 ug/Kg |
| 99474358 | #9, Water from north end of #2 apron | 170 ug/L |
| 99474859 | #10, Water from drain, north of #2 apron | 520 ug/L |
| 99474360 | Blank gauze | not detected |

The wipe results represent the concentration of pentachlorophenol from the extracted oil contained on the gauze. Attached is a site diagram showing the general locations from where the samples were collected.

If you have any questions, please feel free to call me at 360 871-8711.

Attachments:
- Laboratory Results
- Photographs and photograph log sheet
- Site Diagram
- Field Sample Data and Chain of Custody Sheet

# JH Baxter, RCRA Sample Sites, 11/17/99



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 LABORATORY
7411 Beach Dr. East
Port Orchard, Washington 98366

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November 30, 1999

**MEMORANDUM**

SUBJECT: QA Memo for J. H. Baxter Project at Arlington, WA for PCP Analysis of Samples

FROM: R. H. Rieck R. H. Rieck
Chemist

TO: Andy Hess
Project Officer

cc: Cheryl Williams

The Quality Assurance review for six wipe samples, three water samples, and two soil samples from J. H. Baxter located at Arlington, WA for PCP has been completed. Extraction and analysis of the wipe and soil samples were performed by EPA Methods 3540B Modified and 8151 respectively. Extraction and analysis of the water samples were performed by EPA Methods 3510B Modified and 8151 respectively. The samples included in this memo are:

99474350-54 and 99474360 (Gauze wipe samples),
99474355 and 99474357 (Soil samples), and
99474356, 99474358, and 99474359 (Water samples).

I. Holding Times:

Acceptable. All samples for this sample set were collected November 17, 1999. The samples were extracted November 19, 1999. The sample extracts were analyzed November 23, 1999. The sample dilutions were reanalyzed November 30, 1999 because the septum on the GC started to leak near the end of the analysis run on the 23rd. All holding times until analysis were within the allowable 40 days. With all holding times being acceptable no qualifiers were assigned on this basis.

II. Instrument Performance:

A Tracor GC using dual EC detectors with DB-35MS and DB-XLB megabore columns was used for this analysis.

A. DDT Retention Time: Not required for this analysis.

B. Retention Time Windows: Acceptable. Retention times for the standards were within the windows set by the initial calibration. The retention time windows used were 1.0% of the initial retention time.

C. DDT/Endrin Degradation: Not required for this analysis.

D. Surrogate Retention Times: Acceptable. All samples had retention time percent differences less than 1.5% for the surrogate 2,4,5-Tribromophenol (TBP).

III. Calibration:

A. Initial Calibration: Acceptable. For all samples covered by this memo, a five-point calibration was used for PCP (Pentachlorophenol). Both calibration curves were generated using a quadratic equation and had correlation coefficients of 0.999 or better.

B. Analytical Sequence: Acceptable.

C. Continuing Calibration: Acceptable. The continuing calibration standards were within the 15 percent difference criteria for both columns. Therefore, no qualifiers were assigned on this basis.

IV. Method Blank Analysis:

Acceptable. Two blanks, OBO9323A1 and OBO9323A2, were analyzed with the wipe and soil samples. Two blanks, OBW9323A1 and OBW9323A2, were analyzed with the water samples. No target peaks occurred at or above the quantitation limit in any blank. Therefore, no qualifiers were assigned on this basis.

V. Surrogate Recoveries:

Acceptable. The TBP recoveries ranged from 81% to 92% with an average of 86.7% and a standard deviation of ± 4.9% in the water samples, associated blanks and matrix samples. The TBP recoveries ranged from 91% to 129% with an average of 107% and a standard deviation of ± 14.2% in the soil and wipe samples, associated blanks and matrix samples. No qualifiers were assigned on this basis for any of the samples in this set.

VI. Matrix Spike/Matrix Spike Duplicate:

Matrix spikes were prepared using reagent water, since there was insufficient water sample for splitting, spiked in duplicate with PCP, and analyzed with this set. The recoveries were 70% and 77%.

Matrix spikes were also prepared using gauze material which was the material used for collecting the wipe samples. The recoveries were 94% and 103% for PCP.

No qualifiers were assigned on this basis for any of the samples in this set.

VII. Compound Identification/Quantitation:

The following is a listing of PCP concentrations by sample number and matrix type:

| SAMPLE NUMBER | SAMPLE MATRIX | PCP CONCENTRATION |
|---|---|---|
| 99474350 | WIPE | 75,000,000 µg/Kg |
| 99474351 | WIPE | 110,000,000 µg/Kg |
| 99474352 | WIPE | 120,000,000 µg/Kg |
| 99474353 | WIPE | 37,000,000 µg/Kg |
| 99474354 | WIPE | 34,000,000 µg/Kg |
| 99474360 | WIPE BLANK | NOT DETECTED |
| 99474355 | SOIL | 9,600 µg/Kg |
| 99474357 | SOIL | 11,000 µg/Kg |
| 99474356 | WATER | 390 µg/L |
| 99474358 | WATER | 170 µg/L |
| 99474359 | WATER | 520 µg/L |

VIII. Overall Assessment/Data Use:

Acceptable for use with the qualifiers as assigned in the sections above. The data was evaluated using the guidelines set out in the "Laboratory Data Validation Functional Guidelines for Evaluating Organic Analyses" (Dec. '94).

| | | | |
|---|---|---|---|
| **Project Code:** | ESD-043A | **Collected:** | 11/17/99 |
| **Project Name:** | J.H. BAXTER, ARLINGTON, WA | **Matrix:** | Other |
| **Project Officer:** | ANDY HESS | **Sample Number:** | 99474350 |
| **Account Code:** | 0001B10P90102E | **Type:** | Reg sample |
| **Station Description:** | #1 APRON, NORTH OF RETORT #2 | | |

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **GC** | | | | | |
| **Parameter** | : Herbicides | | | | |
| **Method** | : 515.1 | Determination of Chlorinated Acids in Water | | | |
| **Prep Method** | : 3540B | | | | |
| **Analytes** | : **87865** | **Pentachlorophenol** | **75000000** | **ug/kg** | |
| | 118796 | Phenol, 2,4,6-tribromo | 117 | %Rec | |

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| | | | |
|---|---|---|---|
| **Project Code:** | ESD-043A | **Collected:** | 11/17/99 |
| **Project Name:** | J.H. BAXTER, ARLINGTON, WA | **Matrix:** | Other |
| **Project Officer:** | ANDY HESS | **Sample Number:** | 99474351 |
| **Account Code:** | 0001B10P90102E | **Type:** | Reg sample |
| **Station Description:** | #2 SEAM BETWEEN APRON & DRIP PAD OF RETO | | |

## GC

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **Parameter** | : Herbicides | | | | |
| **Method** | : 515.1 | Determination of Chlorinated Acids in Water | | | |
| **Prep Method** | : 3540B | | | | |
| **Analytes** | : **87865** | **Pentachlorophenol** | **110000000** | **ug/kg** | |
| | 118796 | Phenol, 2,4,6-tribromo | 120 | %Rec | |

| | | | |
|---|---|---|---|
| **Project Code:** | ESD-043A | **Collected:** | 11/17/99 |
| **Project Name:** | J.H. BAXTER, ARLINGTON, WA | **Matrix:** | Other |
| **Project Officer:** | ANDY HESS | **Sample Number:** | 99474352 |
| **Account Code:** | 0001B10P90102E | **Type:** | Reg sample |
| **Station Description:** | #3 AREA BETWEEN THE 2 DRIP DAPS | | |

## GC

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **Parameter** | : Herbicides | | | | |
| **Method** | : 515.1 | Determination of Chlorinated Acids in Water | | | |
| **Prep Method** | : 3540B | | | | |
| **Analytes** | : **87865** | **Pentachlorophenol** | **120000000** | **ug/kg** | |
| | 118796 | Phenol, 2,4,6-tribromo | 122 | %Rec | |

| | | | |
|---|---|---|---|
| **Project Code:** | ESD-043A | **Collected:** | 11/17/99 |
| **Project Name:** | J.H. BAXTER, ARLINGTON, WA | **Matrix:** | Other |
| **Project Officer:** | ANDY HESS | **Sample Number:** | 99474353 |
| **Account Code:** | 0001B10P90102E | **Type:** | Reg sample |
| **Station Description:** | #4 SEAM B/APRON & DRIP PAD OF RETORT #3 | | |

## GC

**Parameter** : Herbicides
**Method** : 515.1 Determination of Chlorinated Acids in Water
**Prep Method**: 3540B

| **Analytes** | | **Result** | **Units** | **Qlfr** |
|---|---|---|---|---|
| **87865** | **Pentachlorophenol** | **37000000** | **ug/kg** | |
| 118796 | Phenol, 2,4,6-tribromo | 129 | %Rec | |

| | | | |
|---|---|---|---|
| **Project Code:** | ESD-043A | **Collected:** | 11/17/99 |
| **Project Name:** | J.H. BAXTER, ARLINGTON, WA | **Matrix:** | Other |
| **Project Officer:** | ANDY HESS | **Sample Number:** | 99474354 |
| **Account Code:** | 0001B10P90102E | **Type:** | Reg sample |
| **Station Description:** | #5 APRON, NORTH SIDE OF RETORT #3 | | |

## GC

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **Parameter** | : Herbicides | | | | |
| **Method** | : 515.1 | Determination of Chlorinated Acids in Water | | | |
| **Prep Method** | : 3540B | | | | |
| **Analytes** | : **87865** | **Pentachlorophenol** | **34000000** | **ug/kg** | |
| | 118796 | Phenol, 2,4,6-tribromo | 124 | %Rec | |

| | | | |
|---|---|---|---|
| **Project Code:** | ESD-043A | **Collected:** | 11/17/99 |
| **Project Name:** | J.H. BAXTER, ARLINGTON, WA | **Matrix:** | Solid |
| **Project Officer:** | ANDY HESS | **Sample Number:** | 99474355 |
| **Account Code:** | 0001B10P90102E | **Type:** | Reg sample |
| **Station Description:** | #6 SOIL FROM RETORT #3 APRON | | |

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **GC** | | | | | |
| **Parameter** | : Herbicides | | | | |
| **Method** | : 515.1 | Determination of Chlorinated Acids in Water | | | |
| **Prep Method** | : 3540B | | | | |
| **Analytes** | : **87865** | **Pentachlorophenol** | **9600** | **ug/kg** | |
| | 118796 | Phenol, 2,4,6-tribromo | 98 | %Rec | |

| | | | |
|---|---|---|---|
| **Project Code:** | ESD-043A | **Collected:** | 11/17/99 |
| **Project Name:** | J.H. BAXTER, ARLINGTON, WA | **Matrix:** | Liquid |
| **Project Officer:** | ANDY HESS | **Sample Number:** | 99474356 |
| **Account Code:** | 0001B10P90102E | **Type:** | Reg sample |
| **Station Description:** | #7 WATER FROM DRAIN NORTH OF #3 APRON | | |

## GC

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **Parameter** | : Herbicides | | | | |
| **Method** | : 515.1 | Determination of Chlorinated Acids in Water | | | |
| **Prep Method** | : 3510 | Separatory funnel liq-liq extraction | | | |
| **Analytes** | : **87865** | **Pentachlorophenol** | **390** | **ug/L** | |
| | 118796 | Phenol, 2,4,6-tribromo | 90 | %Rec | |

| | | | |
|---|---|---|---|
| **Project Code:** | ESD-043A | **Collected:** | 11/17/99 |
| **Project Name:** | J.H. BAXTER, ARLINGTON, WA | **Matrix:** | Solid |
| **Project Officer:** | ANDY HESS | **Sample Number:** | 99474357 |
| **Account Code:** | 0001B10P90102E | **Type:** | Reg sample |
| **Station Description:** | #8 SEDIMENT N. END OF #2 APRON | | |

## GC

**Parameter** : Herbicides
**Method** : 515.1 Determination of Chlorinated Acids in Water
**Prep Method**: 3540B

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **Analytes** : | **87865** | **Pentachlorophenol** | **11000** | **ug/kg** | |
| | 118796 | Phenol, 2,4,6-tribromo | 100 | %Rec | |

| | | | |
|---|---|---|---|
| **Project Code:** | ESD-043A | **Collected:** | 11/17/99 |
| **Project Name:** | J.H. BAXTER, ARLINGTON, WA | **Matrix:** | Liquid |
| **Project Officer:** | ANDY HESS | **Sample Number:** | 99474358 |
| **Account Code:** | 0001B10P90102E | **Type:** | Reg sample |
| **Station Description:** | #9 WATER N. END OF #2 APRON | | |

## GC

**Parameter** : Herbicides
**Method** : 515.1 Determination of Chlorinated Acids in Water
**Prep Method**: 3510 Separatory funnel liq-liq extraction

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **Analytes** | **87865** | **Pentachlorophenol** | **170** | **ug/L** | |
| | 118796 | Phenol, 2,4,6-tribromo | 81 | %Rec | |

| | | | |
|---|---|---|---|
| **Project Code:** | ESD-043A | **Collected:** | 11/17/99 |
| **Project Name:** | J.H. BAXTER, ARLINGTON, WA | **Matrix:** | Liquid |
| **Project Officer:** | ANDY HESS | **Sample Number:** | 99474359 |
| **Account Code:** | 0001B10P90102E | **Type:** | Reg sample |
| **Station Description:** | #10 WATER FROM DRAIN N. OF #2 APRON | | |

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **GC** | | | | | |
| **Parameter** | : Herbicides | | | | |
| **Method** | : 515.1 | Determination of Chlorinated Acids in Water | | | |
| **Prep Method** | : 3510 | Separatory funnel liq-liq extraction | | | |
| **Analytes** | : **87865** | **Pentachlorophenol** | **520** | **ug/L** | |
| | 118796 | Phenol, 2,4,6-tribromo | 92 | %Rec | |

| | | | |
|---|---|---|---|
| **Project Code:** | ESD-043A | **Collected:** | 11/17/99 |
| **Project Name:** | J.H. BAXTER, ARLINGTON, WA | **Matrix:** | Other |
| **Project Officer:** | ANDY HESS | **Sample Number:** | 99474360 |
| **Account Code:** | 0001B10P90102E | **Type:** | Reg sample |
| **Station Description:** | #11 BLANK SWAB | | |

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **GC** | | | | | |
| **Parameter** | : Herbicides | | | | |
| **Method** | : 515.1 | Determination of Chlorinated Acids in Water | | | |
| **Prep Method** | : 3540B | | | | |
| **Analytes** | : 87865 | Pentachlorophenol | | | ND |
| | 118796 | Phenol, 2,4,6-tribromo | 91 | %Rec | |

**Project Code:** ESD-043A
**Project Name:** J.H. BAXTER, ARLINGTON, WA
**Project Officer:** ANDY HESS
**Account Code:** 0001B10P90102E
**Station Description:**

**Collected:**
**Matrix:** Liquid
**Sample Number:** OBF9323A1
**Type:** Matrix Spike

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **GC** | | | | | |
| **Parameter** : Herbicides | | | | | |
| **Method** : | | | | | |
| **Prep Method**: | | | | | |
| **Analytes** : | 87865 | Pentachlorophenol | 70 | %Rec | |
| | 118796 | Phenol, 2,4,6-tribromo | 83 | %Rec | |

**Project Code:** ESD-043A
**Project Name:** J.H. BAXTER, ARLINGTON, WA
**Project Officer:** ANDY HESS
**Account Code:** 0001B10P90102E
**Station Description:**

**Collected:**
**Matrix:** Liquid
**Sample Number:** OBF9323A1
**Type:** Matrix Spike Dupl

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **GC** | | | | | |
| **Parameter** : Herbicides | | | | | |
| **Method** : | | | | | |
| **Prep Method**: | | | | | |
| **Analytes** : | 87865 | Pentachlorophenol | 77 | %Rec | |
| | 118796 | Phenol, 2,4,6-tribromo | 91 | %Rec | |

**Project Code:** ESD-043A
**Project Name:** J.H. BAXTER, ARLINGTON, WA
**Project Officer:** ANDY HESS
**Account Code:** 0001B10P90102E
**Station Description:**

**Collected:**
**Matrix:** Other
**Sample Number:** OBF9323B1
**Type:** Matrix Spike

## GC

**Parameter** : Herbicides
**Method** :
**Prep Method**:

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **Analytes** | 87865 | Pentachlorophenol | 94 | %Rec | |
| | 118796 | Phenol, 2,4,6-tribromo | 94 | %Rec | |

**Project Code:** ESD-043A
**Project Name:** J.H. BAXTER, ARLINGTON, WA
**Project Officer:** ANDY HESS
**Account Code:** 0001B10P90102E
**Station Description:**

**Collected:**
**Matrix:** Other
**Sample Number:** OBF9323B1
**Type:** Matrix Spike Dupl

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **GC** | | | | | |
| **Parameter** : Herbicides | | | | | |
| **Method** : | | | | | |
| **Prep Method**: | | | | | |
| **Analytes** : | 87865 | Pentachlorophenol | 103 | %Rec | |
| | 118796 | Phenol, 2,4,6-tribromo | 103 | %Rec | |

| | | | |
|---|---|---|---|
| **Project Code:** | ESD-043A | **Collected:** | |
| **Project Name:** | J.H. BAXTER, ARLINGTON, WA | **Matrix:** | Other |
| **Project Officer:** | ANDY HESS | **Sample Number:** | OBO9323A1 |
| **Account Code:** | 0001B10P90102E | **Type:** | Blank |
| **Station Description:** | | | |

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **GC** | | | | | |
| **Parameter** | : Herbicides | | | | |
| **Method** | : 515.1 | Determination of Chlorinated Acids in Water | | | |
| **Prep Method** | : 3540B | | | | |
| **Analytes** | : 87865 | Pentachlorophenol | | | ND |
| | 118796 | Phenol, 2,4,6-tribromo | 93 | %Rec | |

**Project Code:** ESD-043A
**Project Name:** J.H. BAXTER, ARLINGTON, WA
**Project Officer:** ANDY HESS
**Account Code:** 0001B10P90102E
**Station Description:**

**Collected:**
**Matrix:** Other
**Sample Number:** OBO9323A2
**Type:** Blank

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **GC** | | | | | |
| **Parameter** | : Herbicides | | | | |
| **Method** | : 515.1 | Determination of Chlorinated Acids in Water | | | |
| **Prep Method** | : 3540B | | | | |
| **Analytes** | : 87865 | Pentachlorophenol | | | ND |
| | 118796 | Phenol, 2,4,6-tribromo | 93 | %Rec | |

| | | | |
|---|---|---|---|
| **Project Code:** | ESD-043A | **Collected:** | |
| **Project Name:** | J.H. BAXTER, ARLINGTON, WA | **Matrix:** | Liquid |
| **Project Officer:** | ANDY HESS | **Sample Number:** | OBW9323A1 |
| **Account Code:** | 0001B10P90102E | **Type:** | Blank |
| **Station Description:** | | | |

## GC

| | | | | Result | Units | Qlfr |
|---|---|---|---|---|---|---|
| **Parameter** | : | Herbicides | | | | |
| **Method** | : | 515.1 | Determination of Chlorinated Acids in Water | | | |
| **Prep Method** | : | 3510 | Separatory funnel liq-liq extraction | | | |
| **Analytes** | : | 87865 | Pentachlorophenol | 0.38 | ug/L | U |
| | | 118796 | Phenol, 2,4,6-tribromo | 81 | %Rec | |

**Project Code:** ESD-043A
**Project Name:** J.H. BAXTER, ARLINGTON, WA
**Project Officer:** ANDY HESS
**Account Code:** 0001B10P90102E
**Station Description:**

**Collected:**
**Matrix:** Liquid
**Sample Number:** OBW9323A2
**Type:** Blank

| | | | Result | Units | Qlfr |
|---|---|---|---|---|---|
| **GC** | | | | | |
| **Parameter** | : Herbicides | | | | |
| **Method** | : 515.1 | Determination of Chlorinated Acids in Water | | | |
| **Prep Method** | : 3510 | Separatory funnel liq-liq extraction | | | |
| **Analytes** | : 87865 | Pentachlorophenol | 0.38 | ug/L | U |
| | 118796 | Phenol, 2,4,6-tribromo | 89 | %Rec | |